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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

In re TWITTER, INC. SECURITIES
 LITIGATION

Case No. 4:16-cv-05314-JST (SK)
 (Consolidated with 4:16-cv-05439-JST)

This Document Relates to:

ALL ACTIONS

CLASS ACTION

**DECLARATION OF KENNEY DENG IN
 SUPPORT OF DEFENDANTS' AND NON-
 PARTY KENNEY DENG'S JOINT
 ADMINISTRATIVE MOTION TO FILE
 UNDER SEAL (RE: DEFENDANTS' AND
 NON-PARTY KENNEY DENG'S JOINT
 MOTION TO QUASH THE TRIAL
 SUBPOENA TO KENNEY DENG)**

The Hon. Jon S. Tigar

1 I, Kenney Deng, declare as follows:

2 1. I worked for Twitter from June 2013 to July 2017 as a Financial Analyst and Senior
3 Financial Analyst. I no longer work for Twitter.

4 2. I am not a party to this case.

5 3. I submit this declaration pursuant to Civil Local Rules 7-11(a) and 79-5(d)(1)(A) in
6 support of Twitter, Inc., Richard Costolo, and Anthony Noto's (the "Defendants'") and Non-Party
7 Kenney Deng's Joint Administrative Motion to file under seal portions of (1) Defendants' and Non-
8 Party Kenney Deng's Joint Motion to Quash the Trial Subpoena to Kenney Deng (the "Joint Motion
9 to Quash"), and (2) the Declaration of Kenney Deng in Support of the Joint Motion to Quash (the
10 "Deng Declaration").

11 4. The Court entered a Protective Order in this case on April 10, 2018. (ECF No. 159.)

12 5. The Joint Motion to Quash and Deng Declaration contain highly sensitive, private, and
13 personal information about my personal life and medical history. Portions of these documents are
14 therefore "privileged, protectable as a trade secret, or otherwise entitled to protection under the law"
15 as described in Civil Local Rule 79-5. As such, the narrowly tailored redactions Defendants have
16 proposed are necessary to protect my private and personal information, and there is a compelling need
17 to seal these portions of the documents. *See Salgado v. Iqvia, Inc.*, No. 18-CV-2785-BAS-WVG, 2020
18 WL 1322949, at *2 (S.D. Cal. Mar. 20, 2020); *see also Racies v. Quincy Bioscience, LLC*, No. 15-
19 CV-00292-HSG, 2017 WL 6405612, at *2 (N.D. Cal. Dec. 15, 2017); *Seals v. Mitchell*, No. CV 04-
20 3764 NJV, 2011 WL 1233650, at *2 (N.D. Cal. Mar. 30, 2011).

21 6. Defendants and Non-Party Kenney Deng provide the following chart of the materials
22 they request be sealed:¹

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28 ¹ All proposed redactions in the exhibits filed under seal are highlighted in yellow and/or outlined in red.

Document	Portion to be Sealed
Joint Motion to Quash the Trial Subpoena to Kenney Deng	Redacted portions.
Declaration of Kenney Deng in Support of Joint Motion to Quash the Trial Subpoena to Kenney Deng	Redacted portions.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on May 12, 2020 in Los Angeles, California.

/s/ Kenney Deng
Kenney Deng

ECF ATTESTATION

I, Jonathan K. Youngwood, am the ECF User whose user ID and password are being used to file this Declaration of Kenney Deng in Support of Defendants' and Non-Party Kenney Deng's Joint Administrative Motion to File Under Seal. I hereby attest that I have on file all holographic signatures corresponding to any signatures indicated by a conformed signature (/S/) within this e-filed document, and the original signature can be provided once current restrictions due to COVID-19 are lifted.

Dated: May 12, 2020

SIMPSON THACHER & BARTLETT LLP

By /s/ Jonathan K. Youngwood
JONATHAN K. YOUNGWOOD

Attorneys for Defendants Twitter, Inc., Richard Costolo, and Anthony Noto, and Non-Party Kenney Deng